

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Joseph P. Beck

Debtor(s)

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Case No.: 16-17937-ELF

Chapter 13

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, Joseph P. Beck, by and through his undersigned counsel, hereby move to modify his Chapter 13 Plan and in support thereof aver as follows:

1. Debtors filed a Chapter 13 Bankruptcy on or about November 1, 2016.
2. The Chapter 13 filing was assigned case number 16-17937-ELF.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about September 14, 2017.
4. The confirmed Chapter 13 Plan included a step-up beginning July 1, 2019 but the Debtor inadvertently failed to make the adjusted payments and continued making the pre-step-up payments.
5. The Debtor requests the Court to permit the modification of the Chapter 13 Plan to cure the arrears to the Trustee.
6. The Debtor's proposed modified Chapter 13 Plan, attached hereto as "**Exhibit A**", increases the Debtor's Plan payment to \$1,353.00 per month and is affordable to the Debtor.
7. In furtherance of the Motion, the proposed Modified Plan will be filed contemporaneously with this Motion.

WHEREFORE, the Debtor requests that he be permitted to modify his Chapter

13 Plan for the above-stated reasons.

Dated: February 21, 2020

/s/Brad J. Sadek, Esq
Brad J. Sadek, Esq.
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